

In the matter of           the Resource Management Act 1991

And

In the matter of           The Queenstown Lakes Proposed District Plan

And

In the matter of           The Rezoning Hearing Stream 12 – (Upper Clutha Mapping)

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**MEMORANDUM OF COUNSEL REGARDING SCHEDULED HEARING TIME**

Dated 24 May 2017

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**Solicitors**

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**anderson  
lloyd.**

## MAY IT PLEASE THE PANEL

- 1 This Memorandum is lodged on behalf of Stuart Ian & Melanie Kiri Agnes Pinfold & Satomi Enterprises Limited (Submitter 0622) and Satomi Holdings Limited (submitter 0619) (**Submitters**).
- 2 In Hearing Stream 8 Business Zones, the Panel directed that the Submitters be transferred to this hearing.
- 3 The Submitters were scheduled to appear at this hearing tomorrow Thursday 25 May 2017 10am – 11.30am. The Submitters wish to vacate their hearing time and no longer wish to appear.
- 4 The Submitters have lodged expert planning evidence on the proposed Local Shopping Centre Zone (**LSCZ**) and in particular the proposed Cardrona Valley Road LSCZ and potential effects this part of the Zone will have on the Submitters' properties.<sup>1</sup>
- 5 The Submitters sought additional controls within the LSCZ rules including amended setbacks, building heights, and building coverage rules, to mitigate the adverse effects on the interface between the LSCZ and the Submitters' land.
- 6 Other submitters sought amendments to the extent of this particular LSCZ which are of direct relevance to the Submitters' concerns.
- 7 Evidence was filed on behalf of the Submitters' to preserve their position:
  - (a) in the event Council changed its view and its expert evidence no longer concurred with the section 42A report recommendation to reduce the LSCZ area; and
  - (b) if the Commission is not minded to fully accept Council's position and reduce the LSCZ area such that it no longer adjoins the Submitters' properties.
- 8 The Council's expert planner Ms Vicki Jones recommends that the notified extent of the LSCZ is reduced from 2.7ha to 1ha<sup>2</sup>. The result is that the LSCZ would no longer adjoin the Submitters' properties. This outcome addresses the Submitter's concerns.

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<sup>1</sup> Evidence of Dan Curley and Louise Wright dated 4 April 2017

<sup>2</sup> Rebuttal Evidence of Vicki Jones paragraph 3.6 dated 5 May 2017

Dated this 24<sup>th</sup> Day of May 2017

A handwritten signature in black ink, appearing to read 'V Robb', written in a cursive style.

**Vanessa Robb**  
Counsel for Stuart Ian & Melanie Kiri  
Agnes Pinfold & Satomi Enterprises  
Limited and Satomi Holdings Limited